Date: October 8, 2025

Via Email and U.S. Mail
The Honorable Representative Quang Nguyen
Arizona House Judiciary Committee
1700 W. Washington St.
Phoenix, AZ 85007

RE: Request for Investigation of Impeachable Offenses by Charlene D. Jackson, Judge of the Maricopa County Superior Court

Dear Esteemed Chairman and Honorable Members of the Committee,

I am writing to respectfully request the House Judiciary Committee, or any member of the Legislature empowered to act, to initiate or call for a formal inquiry into allegations of impeachable conduct by Judge Charlene D. Jackson of the Maricopa County Superior Court.

This request is not made lightly and with full cognizance of the risks it carries. I am aware that authoring and sending this letter exposes me to inevitable and prejudicial retaliation that jeopardizes my safety and liberty. Nevertheless, I am compelled to act. Protecting the safety of Arizona's children and defending the Constitutional rights of Arizona families takes precedence over my personal comfort.

The misconduct detailed herein is not an isolated incident concerning only my personal experience but is representative of a systemic judicial failure that has caused demonstrable harm to numerous other litigants and families in Maricopa County, requiring a comprehensive legislative remedy. This situation is a full-blown Civil Rights Crisis that I am blowing the whistle on before one of our children is murdered.

I. The Constitutional and Statutory Mandate of the House Judiciary Committee

The Arizona Constitution vests the sole power of impeachment in the House of Representatives. **Pursuant to Article 8, Part 2, Section 1 of the Arizona Constitution, any Justice of the Supreme Court or Judge of the Superior Court is subject to impeachment for "high crimes, misdemeanors or malfeasance in office."** The House Judiciary Committee, as the designated body responsible for legislative oversight concerning judicial matters and the administration of justice, possesses the inherent authority and legislative duty to conduct or order a comprehensive preliminary investigation (inquiry) into the allegations contained herein.

This inquiry is essential to determine whether sufficient grounds exist to warrant the presentation of Articles of Impeachment to the full House. It is my understanding that the Committee's duty to investigate is triggered only when allegations plausibly rise to the level of

impeachable conduct. I assert that the voluminous and documented evidence detailed in Section II and the accompanying exhibits clearly demonstrates that Judge Jackson's conduct has certainly risen to, and indeed exceeded, the threshold of impeachable conduct defined as "high crimes, misdemeanors or malfeasance in office."

Furthermore, the power of impeachment is an independent and non-delegable constitutional check, and legislative inquiry is warranted and necessary when the state's primary judicial oversight body, the Arizona Commission on Judicial Conduct, is alleged to have failed or refused to adequately investigate or address evidence of high crimes, misdemeanors, or malfeasance. The Committee's function in this matter is to safeguard the integrity of the Judicial Branch, enforce accountability among its officers, and ensure that the Constitutional rights of Arizona citizens, especially those of children, are protected from judicial misconduct and abuse of authority.

The Legislature is the only body empowered to intervene when other oversight mechanisms fail, and the Judiciary Committee is the mechanism through which that intervention begins.

II. Systemic Failure, Refusal of Accountability, and Exhaustion of Remedies

Violation of Judicial Oath: On October 14, 2022, Judge Charlene D. Jackson took an Oath to support the Constitutions of the United States and the State of Arizona and to faithfully and impartially discharge the duties of her office. Regrettably, Judge Jackson has **consistently violated her Oath** throughout her tenure, resulting in the willful and intentional deprivation of citizens' Constitutional rights, including those of children.

Failure of Oversight Mechanisms: Arizona's only judicial oversight agency—the Commission on Judicial Conduct (the "Commission")—has failed to remain in compliance with its constitutional mandate. It is no longer functioning as a safeguard for the public or the judiciary. The Commission has acted outside its jurisdiction, disregarded credible complaints, and enabled retaliatory conduct by judicial officers. Its failure to remain impartial and to enforce the Code of Judicial Conduct has left the public exposed and the judiciary compromised.

Exhaustion of Remedies: Prior to writing this letter, I pursued every available avenue for redress. Despite repeated efforts, no agency including the Arizona Commission on Judicial Conduct, the Presiding Judges of the Maricopa County Superior Court, the Governor of Arizona or the Attorney General has initiated a proper investigation or taken meaningful action to protect the public from Judge Charlene D. Jackson. This systemic failure and lack of accountability has emboldened Judge Jackson, sending a clear message that she is untouchable.

I believe Judge Jackson's misconduct has escalated beyond the scope of her judicial role and now includes actions taken in her personal capacity. These actions may constitute violations of state and federal criminal statutes and therefore fall outside the protections afforded by judicial immunity. Despite the public disclosure of serious allegations involving both judicial

misconduct and potential criminal conduct, no investigation has been initiated. This failure to act sends a dangerous message that individuals in positions of power within the justice system are effectively above the law. It erodes public trust, stands as a profound embarrassment to the judiciary and is offensive to every State Representative who abides by and respects the Oath they swore to.

Exactly 1 year ago, Arizona State Representative Rachel Keshel submitted a formal letter of inquiry to Judge Charlene D. Jackson on behalf of constituents, myself included. The letter outlined a series of serious concerns and extended an invitation for Judge Jackson to meet with her. These concerns included allegations of judicial bias, potential collusion with court-appointed experts, rulings inconsistent with Arizona law and procedural requirements, the appointment of forensic providers resulting in financial hardship, and adverse custody decisions that placed children at risk.

Judge Jackson refused to engage with the inquiry, despite its seriousness and the public interest involved. Her refusal to engage in any meaningful inquiry from a sitting legislator's formal request reflects a troubling disregard for transparency and accountability. Since that time, her conduct has become increasingly reckless. Notably, Judge Jackson fraudulently obtained a restraining order against me in March of 2025 where she claimed the inquiry along with other formal complaints that I submitted to oversight agencies and government entities were considered "harassment" and cited how State Representatives lack the authority to investigate her conduct, due to the Separation of Powers.

III. Specific Articles for Impeachment Inquiry

The basis for this request is a documented pattern of sustained judicial misconduct, willful abuse of legal authority, and potential criminal conduct. **This consistent pattern of failing to follow court rules, the Judicial Code of Conduct, state law, and accepted ethical norms, demonstrates a profound disregard for her duties and responsibilities as a judge**. The incidents detailed below serve as only a few concrete examples of the widespread damage inflicted upon myself, my daughter, my family and numerous other similarly situated victims and families within the Maricopa County judicial system. **This pattern of corrupt and criminal conduct has been detailed in formal complaints and may include additional actions or inactions by Judge Jackson that are discovered in the course of a comprehensive legislative inquiry.**

These offenses include, but are not limited to, the following enumerated incidents:

1. **Malfeasance: Fraudulent Injunction, Perjury, and Suppression of Protected Speech**

Judge Jackson escalated her misconduct when, in **March 2025**—four months after recusing herself from my case and 4 months after the last alleged act of "harassment"—she fraudulently obtained a civil harassment restraining order against me. The **basis of her complaint were several acts alleged "harassment" that occurred spanning over a year time frame while she was**

actively presiding over my Domestic Relations case, **confirming a pre-existing, concealed conflict of interest and bias.**

Although filed in her personal capacity, she **identified herself as a Superior Court Judge** within the application, deliberately invoking her title to lend credibility to false and defamatory claims. The order targeted my constitutionally protected First Amendment Rights—including filing complaints, contacting government agencies, and engaging in public speech—by intentionally mischaracterizing these lawful actions as "harassment." Judge Jackson **intentionally committed perjury and perpetrated a fraud on the court** to maliciously obtain this retaliatory order. The injunction application was secured through a clear pattern of **false sworn claims** that in themselves constitute an **admission of potential criminal conduct.**

A. High Crime: Perjury, Fraudulent Claim, and Abuse of Private Data

The injunction application was secured through a clear pattern of **false sworn claims** that in themselves constitute an **admission of potential criminal conduct** and a direct attack on a critic's privacy. One of Judge Jackson's sworn claims pertains to an online article—a form of **First Amendment-protected activity**—where Judge Jackson alleged, under penalty of perjury, that the authoring account (hosted on a free, anonymous platform like Medium) was **registered to Gerlach's private home address**. This claim is profoundly concerning, as it necessitates one of two criminal conclusions demonstrated by her own sworn filing:

a. **Perjury:** Judge Jackson fabricated the alleged link between the anonymous account and Gerlach's private address to secure the injunction.

b. **Abuse of Power / Illegal Data Access:** If the address was improperly accessed, her sworn allegation reveals the **abuse of state intelligence resources** (such as those potentially available through either my opposing party who is in law enforcement or her husband's reported liaison role at a regional fusion center) to conduct illegal surveillance on a litigant and critic who was engaged in protected speech. This constitutes an **admission of potential illegal data access** used to target a citizen. The act of a sitting judge pulling a critic's private address data in this manner constitutes an abuse of power, misuse of public resources, and should be terrifying to anyone who steps foot into her courtroom.

   Furthermore, anyone in law enforcement who assisted Judge Jackson in obtaining private data pertaining of the author of an online article, that constitutes lawful dissent, violated their Oath as a public servant and is a Felony offense under multiple statutes in Arizona. A legislative inquiry is needed to determine how many other litigants are victims of illegal data access or Judicial Stalking by Judge Charlene Jackson.

This intentional introduction of a false and inflammatory claim into the court record, and / or admission of illegal data access of a critic, squarely meets the definition of **malfeasance** and **high crimes or misdemeanors**.

B. Admission of Judicial Misconduct via Retroactive Ex Parte Claim

A social media post allegedly posted by me in **October 2024** was later cited by Judge Jackson in her restraining order application as "**ex-parte communication.**" Critically, Jackson never raised this issue in court, never entered it into the record, and never recused herself at the time. Instead, she waited five months, until **March 2025**, and cited it in her restraining order application, retroactively reframing protected public speech as improper contact. **In doing so, Jackson admitted to violating her own judicial ethics.**

If Judge Jackson genuinely believed the article constituted "ex-parte communication," she had a legal and ethical duty to disclose it immediately and step off the case, per **Rule 2.9 and Rule 2.11 of the Judicial Code of Conduct**. Her silence at the time tells one of two stories: either she didn't consider it ex-parte when it happened, or she knowingly violated judicial ethics by continuing to preside over a case where she believed she'd been improperly contacted. Either way, **Judge Charlene Jackson continues proving her misconduct in her own words she filed under Penalty of Perjury.**

C. Concealment of Conflict and Retaliatory Rulings

Judge Jackson admitted in her sworn filing to **actively participating in criminal investigations** against me with the law enforcement agency that employs my opposing party, an agency that **lacked jurisdiction** over my residence, her residence, or the courthouse. Throughout the entire period of alleged harassment and investigations (spanning over a year), she remained the judge presiding over my child custody case and issued numerous adverse and retaliatory orders, including, but not limited to: **removing a child from her mother and placing her with our abuser, issuing summary denials for nearly every motion I filed, ordering me to pay attorney's fees while self-represented, and issuing orders including warrants on an *ex parte* basis** that did not comply with law or proper procedural rules. All of which she did after failing to follow proper procedures to obtain jurisdiction over the case and intentionally blocked my ability to appeal her improper rulings. **At no point did she disclose these allegations of "harassment," her participation in these investigations, or recuse herself due to a personal conflict or concealed bias.** She waited until four months after her recusal and four months after the last alleged incident of “harassment” to file the restraining order.

D. Additional Sworn Falsehoods, Concealment, and Misrepresentation

Over the last 2.5 years I filed numerous complaints regarding the egregious misconduct and civil rights violations in Judge Jackson’s courtroom. When every state agency ignored credible

allegations of misconduct, and failed to protect the public from her, I began exposing Judge Jackson's misconduct publicly. I have supporting evidence for every allegation I made against Judge Charlene Jackson. She made several **demonstrably false claims under oath** while identifying herself as a Superior Court Judge on the restraining order application, underscoring a pattern of perjury and obstruction. These demonstrably false claims include, but are not limited to:

- **False Claim Regarding Warrants:** Jackson falsely claimed she had issued only one warrant during her judicial tenure. This is contradicted by public records showing she issued **multiple warrants in my case alone and warrants in other cases,** including at least one other high-impact warrant in an unrelated case that resulted in the severe traumatization of children by a SWAT team, which I have a copy of.

- **False Denial of Specific Statements:** Jackson denied issuing a ruling based on a **"gut feeling"** or **"gut reaction." She also denied stating she had a "personal interest" in a case.** These denials are demonstrably false, as a licensed attorney and their client attested to those very statements in a successful Motion for Change of Judge, that was granted in their favor and is available on the public record. Judge Jackson's failure to report that attorney to the State Bar, which she would be obligated to do if the attorney was lying in a pleading, confirms the public record is true and her sworn denial is false. Notably, those statements happen to be missing from their FTR recordings.

- **False Claim Regarding Court System Control (FTR):** Jackson falsely claimed she has no control over her courtroom recording system. This claim is contradicted by multiple complaints from litigants and attorneys regarding missing, muted, or tampered portions of their court recordings. Any other Superior Court Judge can attest to the fact that Jackson's claim she has no control over her courtroom audio is a flat out lie. This falsehood appears intended to cover Judge Jackson's practice of **muting the FTR when making inappropriate statements or concealing misconduct** during court proceedings, constituting obstruction, tampering with records and violations of due process.

Retaliation and Defamation: Judge Jackson used the official restraining order application to maliciously defame me, calling me a **"liar and conspiracy theorist"** to silence honest public disclosure of judicial ethical misconduct violations including those listed above.

The use of her judicial title to enforce demonstrably false, sworn statements constitutes a severe attack on the judicial oath and judicial integrity.

E. High Crime: Abuse of Process and Retaliation Against Protected Speech

Judge Jackson's abuse of process continued post-filing. She misused taxpayer funds when she had me served a total of 7 times including during 2 different court appearances over a month

apart, multiple times while I was in jail awaiting extradition to Arizona and after extradition to Maricopa County, in attempt to manipulate my treatment while incarcerated. A prosecutor subsequently relied on her false sworn statements in open court to suggest harsher bond conditions, demonstrating Judge Jackson's ongoing attempt to **influence judicial officers**, **manipulate judicial proceedings** and use her position to inflict further harm including reputational harm on those who unknowingly repeat Judge Jacksons perjurious claims as facts.

The core basis of the restraining order was the alleged "harassment" of a public official via protected political and critical speech regarding her judicial conduct, demonstrating an unconstitutional abuse of legal process.

The restraining order itself was a malicious attempt to suppress protected speech, conceal her own misconduct, and preemptively discredit me as Judge Jackson knew she would be a witness in my custodial interference case where substantial evidence of her misconduct will be presented at trial. Judge Jackson aimed to intimidate me into silence while punishing and retaliating against me for my continued public advocacy.

The misuse of a protective order mechanism to harass, intimidate, and silence a critic and suppress core Constitutional rights including Free Speech constitutes an act of **judicial tyranny** that rises to the level of **high crimes** and warrants impeachment.

Judge Jackson's restraining order was not filed in good faith—it was a calculated act of retaliation designed to intimidate me, silence my constitutionally protected advocacy, and manipulate ongoing legal proceedings. While still presiding over my custody case, she actively participated in the investigation that led to felony custodial interference charges stemming from her own improper orders issued without jurisdiction, due process, or disclosure of bias. Her dual role as judge, witness, and complainant creates an undeniable conflict of interest and undermines both civil and criminal proceedings. The restraining order itself contains admitted misconduct and was timed to discredit me ahead of trial, where her collusion with my opposing party will be exposed. She had me served seven times across multiple jurisdictions, and her false claims were used to justify suggesting harsher bond conditions. By naming other judicial officers—some anonymously—she has implicated them in her fraudulent case, damaging their reputations and interfering with judicial integrity. Jackson's conduct reflects harassment, stalking, retaliation, and systemic abuse of power.

Basis for Inquiry: Judge Charlene Jackson's sworn restraining order application creates an irreconcilable conflict that demands legislative scrutiny. Her conduct constitutes either high crimes—namely **systemic perjury, fraud, obstruction of justice**, and **First Amendment retaliation**—or **malfeasance in office** through **willful violation of the Judicial Code of Conduct** by **concealing an active conflict for over a year**. The systematic concealment of her participation in criminal investigations against a litigant in her own courtroom, followed by the strategic timing of the restraining order, reveals a calculated abuse of judicial power. Either she fabricated claims of harassment under oath, or she believed she was genuinely harassed and knowingly failed to recuse herself while continuing to issue biased, non-compliant, and retaliatory orders. Both

scenarios represent profound ethical breaches and constitutional violations. Moreover, her attempt to frame constitutionally protected advocacy as "harassment" is not only legally indefensible—it undermines the judiciary itself and underscores the urgent need for her removal. Her actions reflect a sustained pattern of retaliation against protected speech, abuse of process, and weaponization of her judicial office for personal gain. The alleged acts of **perjury, obstruction, presentation of a false instrument for filing**, and **illegal data access** constitute potential **felony offenses** and meet the constitutional threshold for **high crimes, misdemeanors, and malfeasance in office.**

2. MALFEASANCE: Child Endangerment, Custody Manipulation, and Willful Failure to Apply Domestic Violence Law (A.R.S. § 25-403.03)

This article details a clear pattern of judicial bias, failure to follow statutory law, and abuse of process that resulted in a child being removed from her protective parent and placed with our abuser.

A. Prejudiced Jurisdiction and Due Process Violations

Judge Jackson exhibited immediate and profound bias by knowingly and intentionally **failing to follow the law or proper procedures** regarding jurisdiction and custody. Before I submitted an initial response to the Domestic Relations case or had any opportunity to give testimony, present evidence, or participate in the case in a meaningful way, Judge Jackson inappropriately labeled my constitutionally protected legal action of obtaining a Domestic Violence Restraining Order (DVRO) in California for the safety of myself and our child as **"forum shopping."** This occurred despite obtaining the order from the courthouse closest to my residence when no custody matter was pending. Judge Jackson stated in open court that she thought **"games and shit"** were taking place and that she wanted to discourage them, demonstrating a clear, preconceived bias against my attempts to keep me and our child safe.

Our **Due Process Rights were violated from the inception** of the case at the Uniform Child Custody Jurisdiction and Enforcement Act (UCCJEA) Conference:

- **Improper Notice:** Parties were given only a few hours' notice via email from Judge Jackson's division with instructions to mute microphones, which does not constitute proper legal notice or service.

- **No Evidence or Testimony:** The UCCJEA Conference lasted less than 15 minutes, with no opportunity to submit evidence or sworn testimony either at or prior to the Conference as required by law.

- **Unauthorized Order Termination:** Judge Jackson unilaterally removed the minor child from an Order of Protection issued by the State of California **without ever reviewing the**

Order, examining evidence, hearing testimony, or having knowledge of why the child was protected.

- **Blocking Appeal:** After this flawed jurisdictional ruling, I filed a Notice of Appeal. She proceeded with the Temporary Orders hearing, first claiming she could not proceed if a Notice of Appeal was filed because jurisdiction was divested to the Appellate court, then while visibly bothered by the fact that I filed a Notice of Appeal she said she didn't care because she intentionally placed her ruling in a non-appealable minute entry format. Then she said she could not locate the Notice of Appeal, then later claiming she had the Notie of Appeal at the Temporary Orders hearing but it lacked indicia of filing, demonstrating a dishonest and self-serving excuse to justify issuing orders while jurisdiction was divested after she failed to properly obtain jurisdiction to begin with.

B. Willful Disregard of Domestic Violence and Custody Manipulation

Judge Jackson subsequently issued Temporary Orders removing the child from Mother, her primary caretaker since birth, and placing her with the opposing party (the alleged abuser and a law enforcement officer). She justified this by **falsely claiming "there was no domestic violence to consider"** in the case, despite:

- Mother's extensive sworn testimony and pleadings documenting substantial domestic violence.

- The opposing party's own sworn pleading stating Mother should not have legal decision-making authority because she **allowed our child to witness domestic violence committed by father against mother.**
- The opposing party's own admission to turning verbal arguments physical by **"physically restraining"** Mother during verbal arguments using his "law enforcement de-escalation techniques" in front of the child.

This **false, self-serving finding** allowed Judge Jackson to intentionally **ignore A.R.S. § 25-403.03**, which *mandates* the court to make specific findings and prioritize the safety of the child when domestic violence has occurred. Judge Jackson completely disregarded clear evidence, including the opposing party's recorded police statement, made less than a week before filing the domestic relations case, where he admitted Mother and child **"MOVED to California"** and he was planning to visit. Judge Jackson based her custody switch on the **lie** that Mother took the child out of state without permission. She ruled that Mother's act of taking the child out of a violent and abusive home to safety was **"unjustifiable conduct"** that makes Mother a **"danger"** to the child, effectively punishing the protective parent based on a fabricated legal premise.

C. Malicious Abuse of Process and Void Warrants

Less than three days after these unjust Temporary Orders were issued, the opposing party and his attorney filed a Motion for Enforcement, Contempt, Sanctions, and a **Warrant for the Child with Permission to Enter Private Property**. Opposing counsel stated on the record that their intent was to **"surprise"** me and admitted I hadn't been served with the Temporary Orders yet. Judge Jackson granted these *ex parte* requests, including a warrant for the child, while simultaneously:

- Knowing I had not yet been served with the underlying Temporary Order that formed the basis of the alleged "contempt" and knowing my opposing parties' malicious intent to "surprise" me.

- Knowing that initiating contempt proceedings against an unserved party is a fundamental **abuse of process,** legally impossible, constitutes a frivolous filing and a blatant violation of the Rules of Professional Conduct committed by the attorney.

- Crucially, knowing these Temporary Orders were issued without legally sound jurisdiction, as she had failed to properly conduct the UCCJEA conference and had proceeded with the hearing while jurisdiction was divested to the Appellate Court.

The issuance of this void warrant for a child, granted with the admitted intent to **"surprise"** and hold the protective parent in contempt, demonstrates profound **maliciousness** and a clear abuse of judicial authority, further violating the Rules of Professional Conduct for opposing counsel and violates the Code of Judicial Conduct for Jackson's failure to hold the attorney accountable for her egregious abuse of the ex-parte process.

The act of enforcing orders she knew were voidable due to her own jurisdictional failures and the pending appeal demonstrates profound **malice**. It leveraged a void legal proceeding to secure physical control of our child, effectively punishing me and concealing Judge Jackson's initial errors. Opposing counsel was complicit in this action, as they both knew the legal defects of the underlying orders.

Immediately following the malicious *ex parte* orders, I filed numerous motions, providing irrefutable evidence that the opposing party and his attorney perpetrated fraud on the court. This evidence demonstrated several instances of perjury, perjury by inconsistent statements and a material omission from the ex-parte proceeding that only six days prior to the *ex parte* request—where the opposing party claimed I was a **"danger"** and requested the most intrusive action possible—my opposing party had filed a response in our California Domestic Violence Restraining Order case requesting we share **50/50 legal and physical custody** of our daughter. The contradictory nature of these simultaneous filings—claiming a parent is a "danger" while seeking 50/50 custody—proves the *ex parte* motion was **fraudulent and based on fabricated urgency**. Judge Jackson was presented with this dispositive evidence, yet she **summarily denied each motion**, **willfully refusing to investigate the fraud, stop the abuse of process, or correct the**

record. By doing so, **Judge Jackson effectively enabled and ratified the opposing party's perjury and fraud on the court. The issuance of this void warrant on a child, granted with the admitted intent to "surprise" and hold the protective parent in contempt, demonstrates profound maliciousness and a clear abuse of judicial authority,** further violating the Code of Judicial Conduct and Rules of Professional Conduct for opposing counsel.

D. Retaliation via Vexatious Litigant Threat to Conceal Fraud

Most egregiously, when I attempted to rectify the significant damage caused by these *ex parte* orders—which were a calculated tool to violate my rights to due process and secure orders without opposition—I was met with threats and motions for **Vexatious Litigant Designation**.

Opposing counsel, with the tacit support of Judge Jackson, filed multiple motions requesting the court declare me a vexatious litigant. This action served as a transparent effort to **intimidate me, block my ability to expose the intentional fraud and due process violations** perpetrated by the opposing party and his attorney, and to conceal Judge Jackson's own willful failure to apply the law. I also believe Judge Jackson was trying to conceal her ongoing relationship with my opposing party, his agency, and others which I did not have concrete evidence of existing until she filed her retaliatory restraining order against me. This all happened while Judge Jackson was harboring a conceal bias and concealing conflicts of interest from me. The threat of Vexatious Litigant designation was used not to control genuinely abusive litigation, but as a judicial weapon to suppress protected speech and obstruct the rectification of judicial misconduct. I was not filing frivolous motions. I was filing motions in attempt to rectify the repeated and sustained deprivation of me and our daughter's Constitutional rights.

Basis for Inquiry: The combination of preconceived bias, the intentional failure to follow statutory law (A.R.S. § 25-403.03), the manipulation of jurisdictional rulings to block appeal, the **enforcing of void orders to conceal errors**, the **enabling of fraud on the court through summary denial of corrective motions**, and the **use of Vexatious Litigant sanctions as a tool of intimidation and retaliation** constitutes a sustained pattern of **malfeasance in office** and a willful violation of judicial duty, directly resulting in the endangerment of a child and the deprivation of Mother's and the child's constitutional right to Due Process and Equal Protection.

3. Obstruction, Tampering with Records, and Willful Deprivation of Due Process (Missing FTR Audio)

Factual Detail: Judge Jackson's misconduct during my case included imposing financial sanctions and issuing *ex parte* warrants based on false affidavits. Crucially, Judge Jackson verbally admitted during the Temporary Orders hearing that she intentionally placed a jurisdictional ruling in a **non-appealable minute entry** format to block my ability to appeal the improper ruling where our rights to due process were egregiously violated. When I attempted to obtain the recording of this admission, that portion of the **FTR is missing or muted,** mirroring

similar events alleged in other cases where litigants and attorneys report their FTR audio is missing, muted, erased or trimmed during times when judicial misconduct occurred.

Basis for Inquiry: The intentional placement of rulings in non-appealable formats and the subsequent disappearance of crucial court audio are acts of obstruction and a clear denial of due process. These actions constitute **high crimes, misdemeanors, or malfeasance by corrupting the court record, tampering with records, and blocking lawful avenues for appeal.**

4. HIGH MISDEMEANOR: Prohibited Practice of Law While Serving as a Judge and Material Misrepresentation

Factual Detail (Rule 3.10 Violation): Judge Jackson has engaged in conduct explicitly prohibited by **Rule 3.10 of the Arizona Code of Judicial Conduct**, which states unequivocally: "A judge shall not practice law." In a widely accessible media report (*Phoenix New Times*, December 2022), Judge Jackson publicly identified herself as both a Maricopa County Superior Court Judge and "an attorney representing the Hualapai Tribe." This public, non-hearsay admission confirms a serious, ongoing, or recent breach of judicial ethics that violated Rule 3.10 and potentially created undisclosed conflicts that compromise the integrity of her official actions.

Factual Detail (Concealment and Lack of Candor): Judge Jackson's application for appointment and materials submitted to the Judicial Nominating Commission (JNC) and her official Maricopa County Superior Court biography appear to constitute **material misrepresentation and concealment of professional history**. Publicly verifiable professional documents list several significant judicial and legal roles that are conspicuously omitted from her official application.

These omissions include:

- **Appellate Judge for the Hualapai Tribe** (listed on a 2017 presenter bio, omitted from Judicial Application and Superior Court bio).
- **Judge Pro Tem positions for the Washoe Tribe of California and Nevada** (listed on a public resume, omitted from Judicial Application and Superior Court bio).
- **Attorney for the Hualapai Tribe** (as Judge Jackson identified herself in a media report – also omitted from Judicial Application and Superior Court bio).

Statutory and Ethical Violations: The JNC application requires full disclosure of prior legal and judicial experience under penalty of perjury. Knowingly failing to disclose prior judicial service is a profound breach of candor, violates **Rule 1.2 (Promoting Confidence in the Judiciary)**, and the submission of these documents appears to constitute potential criminal offenses, specifically **Perjury (A.R.S. § 13-2702)** and/or the **Presentment of False Instrument for Filing (A.R.S. § 39-161)**.

Her public admission of practicing law while a sitting Superior Court Judge raises questions about Judge Jackson's fitness for the bench and further evidence of her belief that she is above the law. It also appears she is using her status and lending her title as a Superior Court

Judge to influence the political agenda she is pushing as a tribal gaming attorney for the Hualapai Tribe.

Basis for Inquiry: The combination of publicly practicing law while sitting as a Superior Court Judge and the failure to fully disclose her extensive history in her application constitutes a clear and serious violation of judicial ethics and statutory law. This material misrepresentation to secure a judicial appointment and her subsequent conduct provide direct grounds for consideration of **malfeasance in office** and a violation of her Judicial Oath.

5. MALFEASANCE: Judicial Protection of Criminal Conduct

Factual Detail: Judge Jackson repeatedly protected a **certified law enforcement officer** who is documented to have committed **perjury, perjury by inconsistent statements, and fraud upon the court** to secure custody of a minor child who he abused. This sustained protection of a known criminal element within a judicial proceeding, despite clear evidence, and her willful failure to apply domestic violence protections (as detailed in Article 2) resulted in the child being placed in danger and directly constitutes a **willful breach of judicial duty to protect the welfare of a minor and a violation of the child's Constitutional rights.** This profound corruption of the justice system is a direct result of her action.

Basis for Inquiry: The willful protection of a party who committed a crime to manipulate the court, resulting in the child being placed at risk and the **violation of the child's constitutional rights**, constitutes a severe act of **malfeasance in office** and a gross failure to discharge the duties of a judicial officer faithfully and impartially.

6. MALFEASANCE: Willful Disregard for Controlling Law and Statutory Requirements

Factual Detail: Judge Jackson issued rulings, including custody orders, financial sanctions, warrants, and jurisdictional orders, that **demonstrate a willful and systematic failure to apply established legal precedent and statutory requirements**. This includes the failure to follow proper procedural rules, imposing punitive measures based on void or improper findings, and a general disregard for the constitutional principles of **Due Process and Equal Protection**. This pattern of ignoring the law undermines the rule of law itself, transforming judicial duty into arbitrary exercise of power.

Basis for Inquiry: A judge's core duty is to know and apply the law. The deliberate and repeated failure to follow controlling statutes, rules of procedure, and constitutional mandates is a fundamental breach of the Judicial Oath, constituting **malfeasance in office**.

7. HIGH MISDEMEANOR: Judicial Bias, Retaliation, and Failure to Disclose Conflict

Factual Detail: The systematic breach of impartiality is irrefutably demonstrated by Judge Jackson's own actions. Specifically, for over a year, Judge Jackson **actively and secretly participated in criminal investigations** against me, culminating in the **speculative package accusations** referenced in Article 1. **This conduct violated Rule 2.9 (Ex Parte Communications) by engaging in independent fact-finding and investigation outside the judicial record, thereby relying on extrinsic information.** The **alleged acts forming the basis of her subsequent harassment injunction occurred while she was actively presiding over my custody case**, confirming an active and concealed conflict of interest. She admitted to meeting with investigators from the department that employs the opposing party in my custody case, a department that lacked jurisdiction over our residences or the courthouse. Throughout this period of active, concealed conflict, Judge Jackson:

- **Issued summary denials for nearly every motion filed.**
- **Ordered me to pay attorney's fees multiple times while self-represented.**
- **Issued orders and warrants on an *ex parte* basis** that did not comply with law or proper procedural rules.
- **Placed our child in the care and custody of our abuser** despite his admission that he never took care of her, and I was her primary caretaker since birth.

At no point did she disclose these allegations of "harassment," her participation in these investigations, or recuse herself due to a personal conflict or concealed bias. She waited until four months after her recusal and four months after the last alleged incident of "harassment" to file the restraining order. Her failure to recuse and concealment of her role as a potential witness in a proceeding against a party in her courtroom is an extraordinary, non-waivable conflict of interest. During this time, I filed **multiple motions for change of judge and recusal**, all of which Judge Jackson and Presiding Judges **willfully denied** despite her active conflict and bias, demonstrating **egregious, ongoing malfeasance**.

Due to her personal involvement in these matters, Judge Jackson knew she was to be called as a witness in my criminal custodial interference trial and potentially a witness in other frivolous investigations Judge Jackson inserted herself in. Her failure to recuse and concealment of her role as a potential witness in a proceeding against a party in her courtroom is an extraordinary, non-waivable conflict of interest. This conduct directly violates the fundamental, long-standing principle that **one person cannot serve as both the accuser and the adjudicator**, which is central to the **Due Process Clause** of the Constitution.

Her act of pursuing the restraining order, in which she claimed harassment and victim status, was a **retroactive admission of a pre-existing conflict** that mandated her immediate and mandatory disqualification under **Rule 2.11 (Disqualification)**, a duty she intentionally ignored to maintain control over the case as a personal favor to my opposing party. This entire course of conduct violates **Rule 2.3 (Bias, Prejudice, and Harassment)**. Furthermore, the failure to disclose

concurrent legal work and prior judicial roles in her JNC application created an ongoing, undisclosed conflict of interest in other cases.

Basis for Inquiry: The systematic breach of the fundamental duty of impartiality, the use of a judicial office to pursue a personal vendetta, and the failure to recuse from cases where personal or professional conflicts existed constitute a severe violation of judicial ethics and are direct grounds for **malfeasance in office**.

8. **MALFEASANCE: Corruption of Judicial Process by Enabling Attorney Misconduct**

Factual Detail: Judge Jackson is alleged to have intentionally permitted and enabled the ongoing misconduct of an attorney, specifically **Caitlin Andrade**, within the judicial proceedings. A judge has an affirmative duty to ensure that lawyers adhere to the **Arizona Rules of Professional Conduct** and to intervene against deceptive or unethical practice, as failure to do so corrupts the outcome of the case. By failing to hold Attorney Andrade accountable for documented misconduct, Judge Jackson corrupted the integrity of the proceedings, granting an unfair advantage and effectively making the Court complicit in the attorney's breaches of professional ethics.

Basis for Inquiry: A judge's willful failure to regulate the professional conduct of attorneys in her courtroom is a profound breach of her administrative and ethical duties, undermines the fairness of the judicial process, and constitutes **malfeasance in office**.

9. **MALFEASANCE: Failure to Recuse in a Personal Family Case (Niece's Case) and Retaliation**

Factual Detail: Judge Jackson demonstrated a severe conflict of interest when she was assigned to her own niece's case and **willfully failed to recuse herself in a timely manner**. Judge Jackson was notified of her position on the case via multiple formal channels, including a **Notice of Claim filed with the State of Arizona, a complaint filed with the Commission on Judicial Conduct, a Motion for Change of Judge filed in her own court, and public exposure that she admitted in her restraining order filing that she had read.** Instead of acknowledging the clear conflict and transferring the case—which she had ample opportunity to do—Judge Jackson **called me a liar and conspiracy theorist for exposing the conflict and** for repeatedly raising the issue of the appearance of impropriety. She only recused herself after I sent a formal complaint to the Arizona Supreme Court Justices with screenshots and evidence of her misconduct. Her refusal to recuse until forced, and the subsequent retaliation against me, demonstrates a profound lack of accountability and malicious intent to conceal and deny wrongdoing, while further demonstrating her belief that she is above the law.

Basis for Inquiry: This willful and delayed recusal in a direct family matter, coupled with the judicial retaliation against the person who exposed the conflict, is a profound breach of **Rule 2.11**

(Disqualification) and **Rule 1.2 (Promoting Confidence in the Judiciary)**, confirming a sustained pattern of **malfeasance in office**.

10. MALFEASANCE: Sustained Pattern of Ethical Breaches and Constitutional Deprivation

Factual Detail: The comprehensive complaint lodged with the Arizona Commission on Judicial Conduct details a persistent pattern of procedural manipulation, ethical breaches, and constitutional infringements over a period exceeding two years. The psychological trauma resulting from Judge Jackson's sustained actions—including debilitating anxiety and panic attacks that led to my hospitalization after I spoke publicly about my experience back in June—underscore the immediate danger her continued tenure poses to litigants and the public.

Basis for Inquiry: This documented disregard for judicial ethics and constitutional obligations demonstrates a clear lack of fitness for office and conduct prejudicial to the impartial administration of justice, thereby justifying the Committee's consideration of legislative removal.

11. HIGH CRIME: Systemic Institutional Corruption, Surveillance, and Retaliation in Collusion with the Commission on Judicial Conduct

Factual Detail: **Unauthorized Surveillance and First Amendment Suppression.** Evidence strongly indicates a pattern of institutional complicity, as sworn statements by Judge Jackson confirm that **Commission on Judicial Conduct personnel coordinated with her and court security to monitor my activities and communications** after I expressed intent to contact the media regarding my case. This action is critical because the Commission's authority is strictly limited to investigating and disciplining judges; it **possesses no legal jurisdiction to surveil, investigate, or take action against a complainant.** This unlawful and unconstitutional surveillance exceeds the Commission's investigatory authority, violates multiple criminal statutes, and represents a serious breach of impartial oversight designed to **suppress my protected First Amendment right** to criticize the judiciary. It also amounts to unlawful invasion of privacy and Judicial Stalking.

Factual Detail: **Direct Evidence of Collusion and Defamation.** In her sworn restraining order application, Judge Jackson quoted the Commission's communication:

"I also received an email from the Judicial Conduct Commission advising me that the defendant filed judicial complaints against me and within the complaints the defendant threatened to go to the media about her case. Based on the threat and contents of her complaint they notified court security of the threats. Later that day, I spoke with court security about the nature of the defendants case, and was advised they were monitoring her conduct and online presence for cyberstalking."

If Judge Jackson genuinely believed my actions constituted harassment or cyberstalking, she had a legal and ethical duty to recuse herself. She did not. Her decision to conceal a potential conflict and remain involved in the case for well over a year despite the alleged existence of

investigations and these serious, concealed allegations, raises grave concerns about abuse of authority and the integrity of the entire proceeding. Her non-recusal, when she was allegedly also an aggrieved party, created an irremediable appearance of bias and conflict of interest, lending further weight to the need for a thorough, independent investigation into the relationships and actions of both Judge Jackson and the Commission on Judicial Conduct. Legislative inquiry is needed when there is evidence of a judge colluding with the only oversight body and coordinated Judicial Stalking of litigants.

Suppression of Constitutional Rights: The Commission internally characterized my lawful media engagement as a **"threat,"** raising substantial concerns that it has improperly suppressed protected First Amendment rights and chilled legitimate criticism of the judiciary.

Failure to Enforce Mandatory Recusal: The Commission was aware of the covert investigative operations and surveillance targeting me yet **failed to enforce the mandatory recusal requirements** under the Code of Judicial Conduct. The Commission's prolonged indifference created an environment of impunity that directly emboldened Judge Jackson's conduct to escalate, as she concealed these allegations for months before using them to file a fraudulent and retaliatory injunction. The Commission's willingness to act on minor administrative delays (such as issuing Judge Jackson an advisory letter for a delayed ruling) contrasts sharply with its failure to address profound and systemic issues of concealed bias, collusion, retaliation, and constitutional violations.

Basis for Inquiry: The collusion between a sitting Superior Court Judge and the judicial oversight body to conduct surveillance on a complainant for exercising protected speech rights, specifically for threatening to go to the media, constitutes a **high crime or misdemeanor**. This conduct represents a severe breach of public trust, constitutional rights, and systemic institutional corruption that demands immediate investigation by the legislative branch.

IV. Conclusion

This is not a rogue custody dispute or a case of isolated judicial misconduct. It is a systemic civil rights crisis—one that multiple agencies within Arizona have repeatedly deflected, ignored, or refused to confront. Those who have attempted to help do not have the authority or jurisdiction to take any meaningful action. The pattern of institutional inaction has allowed misconduct to escalate unchecked, placing vulnerable families at risk, eroding public trust in the judiciary and is exposing the State of Arizona to civil liability.

This is about a Judge who is knowingly, willingly, and intentionally violating citizens Constitutional rights, repeatedly, with impunity, leaving citizens in fear for their safety, in fear for the safety of their children, and families are left out in the cold by the State of Arizona will no route for redress, no accountability, and no justice for the abuses that they are subjected to at the hands of a Judicial Officer.

Adding insult to injury, if litigants are lucky enough to get their cases reassigned or Judge Jackson finally recuses herself, as has happened in numerous cases I am aware of, the parties are forced to re-litigate the case in attempt to fix the errors Judge Jackson made. This is extremely burdensome as it is expensive, time consuming and ultimately at the expense of the children involved. Judge Jackson, nor any other members of the judiciary, have taken steps to remedy the deprivation of rights or unconstitutional orders issued by Judge Jackson in dozens of cases that I am personally privy to, although they hold the power to do so. Judge Jackson has not changed her behavior or taken any steps to fix the damage created by her past deprivations of rights or failure to follow the law. Judge Charlene Jackson has shown no remorse for what she has done. Instead, she retaliates against anyone who files complaints or publicly exposes her egregious acts of judicial misconduct, making it incredibly dangerous to leave her on the bench and further demonstrates the need for Legislative intervention as it appears everyone else with authority to intervene is choosing to violate their respective Oaths by choosing to look the other way.

Judge Jackson's latest action— submitting an application for an injunction against harassment that targets constitutionally protected advocacy to silence lawful dissent and to conceal her own misconduct—and the fact that another judicial officer approved it, is proof of institutional decay within Arizona's judiciary. The system is more invested in shielding a judge who violates the law, treats the Constitution as optional, and knowingly places children with abusers and sexual offenders than in upholding justice.

Moreover, Judge Jackson's characterization of lawful dissent—including the filing of formal complaints and the public exposure of her misconduct—as "harassment" is terrifying and underscores the urgent need for her immediate removal from the bench.

Subsequently, the Commission, acting outside of their jurisdiction, and retaliating against a complainant, placing me under surveillance, for threatening to go to the media about my case, instead of investigating credible violations of the Code of Judicial Conduct, as they are mandated to do, highlights the urgent need for Legislative investigation, intervention and oversight.

Arizona families deserve judicial officers who are fair, impartial, and committed to upholding the law. No judge in the United States of America should hold the perverse belief that constitutionally protected oversight and criticism amount to harassment. If Judge Jackson had followed the law and upheld her duty to protect vulnerable individuals—including the defenseless children who are tragically subjected to the civil rights crisis unfolding in her courtroom—there would be nothing for me to expose. Her attempt to silence me through a fraudulent injunction is not merely a personal attack; it is a direct threat to all family court litigants and a broader assault on the democratic principles that underpin our justice system. The fact that the only oversight agency in the state is finding nothing wrong with this behavior from a sitting judge and has taken no action against Judge Jackson is beyond concerning and warrants immediate investigation.

Regrettably, I experienced Judge Jackson's lack of accountability in many ways. One is example is when opposing counsel and Judge Jackson claimed that me having a domestic

violence restraining order and participating in investigations regarding domestic violence and child abuse against my opposing party was harassment because he is a police officer and a domestic violence conviction would prohibit him from carrying a firearm. Instead of holding him accountable for his abuse, I was blamed for my own abuse and blamed for the consequences of his actions. I stopped participating in his prosecution at that point because I was dissuaded by Judge Jackson and fearful I would lose my daughter, which I did anyway. I heard similar stories from other abuse victims stuck under Judge Jackson's rule.

The Arizona Commission on Judicial Conduct, by repeatedly ignoring reports of judicial retaliation and failing to enforce the mandatory Code of Judicial Conduct, created a systemic failure of oversight. Ongoing concerns surrounding the Commission's failures and lack of transparency have been featured in media reports and mentioned by State Representatives in the past, who took no meaningful action after the news cycle was over.

Since the inception of the Ad Hoc Committee on Family Court Orders earlier this year, Arizona has paved the way in long overdue Family Court Reform. The entire nation is watching Arizona, following our lead. Other states are reaching out, requesting guidance on how they can also reform their broken Family Court systems. Millions of eyes are watching Arizona as a select handful of Family Court Judges, including Judge Charlene Jackson, are publicly embarrassing the Judiciary and making a mockery of the State's efforts to lead the way in reform. Arizona should lead by good example and clean up its judiciary.

The abuses that me and my child endured in Arizona's Family Court are something I never thought was possible in the United States of America. We are raised with the understanding and promise that we have rights, secured and protected by the United States Constitution, and no matter how you are wronged, there is always a remedy. How do I look at my daughter and tell her that she is growing up in a country that is refusing to protect her from harm and has gone so far as to block her own mother from protecting her? That is my number one, God given duty as a mother, to protect my child from harm. The State of Arizona, by the authority of Judge Charlene Jackson, placed my child in a State-Created Danger that she was protected from before we were subjected to literal torture in Judge Charlene Jackson's courtroom. My case fits the exact definition of the State Created Danger doctrine.

The foundational legal maxim, ubi jus, ibi remedium—"where there is a right, there is a remedy"—is a core doctrine affirming the entitlement to effective judicial relief for every legal wrong. In this case, this essential maxim has been systematically nullified by the actions of Judge Charlene Jackson. There is no redress for us. There is no accountability or justice, and my daughter is now without her mother, the only caretaker she has known since birth. She has been placed with the man who abused her, abused me in front of her and took the life of our second child, my son, our daughter's brother, at around 20 weeks' gestation, put me in the ICU for a week with sepsis, DIC and organ failure, and permanently left me unable to conceive more children. There are so many laws on the books to protect us, but they were all ignored and violated in Arizona's Family Court because of a rogue judge who habitually prioritizes her personal bias ahead of her duty as a judicial officer, does not possess the ability to be impartial, and refuses to follow the law. The State of Arizona has known about Judge Jackson's egregious

misconduct since at least early 2023 and flat out refuses to stop her. When one of our children dies because of Judge Charlene Jackson, and it's not IF, but WHEN, I will be saying a heck of a lot more than “I told you so.”

My advocacy is not optional. It is a direct response to injustice. It is rooted in survival, in solidarity with other victims, and in the unwavering belief that the Constitution protects our right to speak, to petition, and to demand accountability. My rights as an American Citizen are not negotiable, and my voice is not up for censorship. I do not live under authoritarian rule, and I’m certainly not auditioning for anyone’s dictatorship fantasy. I will not be intimidated, I will not be silenced, and I will not be bullied into relinquishing me or my daughter’s constitutional rights.

It is my civic duty as an American to speak out against injustice, and my unwavering responsibility as a mother to protect all children from harm, including my own. While several of the notoriously abusive Family Court Judges are busy competing for the title of Lead Dictator of the Family Court, I will be relentlessly pursuing accountability until every child is safe, every perpetrator is held accountable, and every official is reminded: you are not above the law.

I am asking our elected officials to take a stand for your constituents, for your neighbors, for our Constitution, for our Democracy and investigate this dangerous Judge before she is responsible for the death of one of us or our children. Our responsibility, as citizens, is to ensure that those entrusted with power are held to the highest standards, preserving the constitutional principles that define our nation.

V. Requested Legislative Action

I respectfully urge the House Judiciary Committee or any other State Representative who believes in our Constitution to stand up and do the right thing for the citizens of Arizona by initiating an investigation or calling for an investigation into the allegations of impeachable offenses committed by Maricopa County Superior Court Judge Charlene Jackson.

The integrity of the Arizona Judiciary, the necessity of holding public officials accountable, and the urgent need to safeguard the constitutional rights of Arizona's citizens demand swift and decisive legislative intervention. I await the Committee's direction in this matter of public urgency.

Respectfully submitted,

Erin Gerlach

You can learn more about the egregious acts of misconduct committed by Judge Charlene Jackson that amount to impeachable offenses here:

https://womenscoalition.substack.com/p/judge-retaliates-takes-out-restraining

https://yournews.com/2025/09/11/3864516/judicial-immunity-revoked-by-her-own-hand-the-collapse-of-charlene/

https://www.change.org/p/investigate-remove-judge-charlene-jackson-for-alleged-negligence-and-misconduct

https://express-press-release.net/news/2024/12/08/1639690

https://michaelvolpe.substack.com/p/the-unknown-special-report-an-interview-5c2

https://yournews.com/2025/06/05/3489547/arizona-mother-faces-felony-charges-after-exposing-police-and-judicial/

https://davisvanguard.org/2025/06/arizona-family-court-corruption-exposed/

https://elections.maricopa.gov/asset/jcr:a079a0f7-6c44-4b35-9ce5-43c40eac266c/2023-REC-02%20Application%20for%20Serial%20Number%20(with%20signature%20requirement).pdf

https://docs.google.com/document/d/1acV29F0LcQfKl7Y_tNyXPAlXipaLtAIWfxvuEepzVkk/edit?usp=sharing

https://azcapitoltimes.com/news/2025/02/07/

https://luthmann.substack.com/p/arizona-legislators-awaken-keshel

https://www.scribd.com/document/781980833/Judge-Charlene-Jackson-Complaint

https://yournews.com/2025/09/14/3879238/custody-by-corruption-how-an-arizona-swat-officer-lied-to/

https://www.scribd.com/document/929026638/Letter-to-Joint-Legislative-Audit-Committee-JLAC-Requesting-Audit-of-Arizona-Commission-on-Judicial-Conduct

https://www.academia.edu/144188856/Weaponized_Legal_Authority_and_Institutional_Complicity_A_Constitutional_and_Ethical_Analysis_of_the_Retaliatory_Injunction_Filed_by_Judge_Charlene_Jackson_Against_Erin_Gerlach_in_Arizona_Family_Court

https://therobingroom.com/state/AZ/judge/29260/Hon.%20Charlene%20%20Jackson/comments

https://www.scribd.com/document/929035548/Ethics-Complaint-Filed-with-the-Arizona-Commission-on-Judicial-Conduct-against-Maricopa-County-Superior-Court-Judge-Charlene-Jackson-assigned-to-the-M

Attachments

To protect the privacy of the children involved and in light of this document's public release, I've heavily redacted its contents and included only select screenshots. Please reach out directly if you require access to the full filings.

Concern Regarding Judicial Integrity and Conduct of Judge Charlene Jackson

Prohibited Practice of Law While Serving as a Judge (Arizona Code of Judicial Conduct Rule 3.10)

Judge Jackson has engaged in conduct explicitly prohibited by Rule 3.10 of the Arizona Code of Judicial Conduct, which states unequivocally: "A judge shall not practice law."

1. **Public Admission of Dual Roles:** In a widely accessible media report (Phoenix New Times, December 2022), Judge Jackson publicly identified herself as both a Maricopa County Superior Court Judge and "an attorney representing the Hualapai Tribe." This public, non-hearsay admission confirms a serious, ongoing, or recent breach of judicial ethics that creates severe conflicts of interest and compromises the full-time attention required of a judicial officer.

2. **Dual Role Conflicts:** While sitting as a Superior Court Judge, Jackson's concurrent capacity as an attorney for the Hualapai Tribe not only violated Rule 3.10 but also diverted her attention from her duties and created unavoidable conflicts that taint the integrity of her official judicial actions.

"We underestimated the number of commercial operators who came here and sought out tribal partnerships," said Charlene Jackson, an attorney representing the Hualapai Tribe near Kingman and a Maricopa County Superior Court judge. "A competitive wave is coming in. It's a little bit scary for us."

Tribes can't compete with the capital held by commercial operators such as Caesars, BetMGM, and FanDuel, Jackson said. While the Las Vegas bigwigs doled out billions of dollars on splashy bait to hook new Arizona sports bettors, tribes were scrambling to compete for licenses and find partners.

"Quite frankly, we were left behind," Jackson said. "The numbers reflect that."

Material Omissions and Misrepresentation in Judicial Application (Rules 1.2 & 2.16)

Judge Jackson's application materials submitted to the Judicial Nominating Commission (JNC) and the Governor's Office, as well as her official Maricopa County Superior Court biography, appear to constitute material misrepresentation and concealment of professional history.

1. **Concealment of Judicial and Legal History:** Publicly verifiable professional documents (including presenter bios for tribal and legal conferences) list several significant judicial and legal roles that are conspicuously omitted from her official judicial application and subsequent Maricopa County Superior Court biography.

    These omissions include:

    a. Appellate Judge for the Hualapai Tribe (listed on a 2017 presenter bio, omitted from judicial application and Superior Court bio).

    b. Judge Pro Tem positions for the Washoe Tribe of California and Nevada (listed on a public resume, omitted judicial application from Superior Court bio).

    c. Attorney for the Hualapai Tribe as Judge Jackson identifies herself as in the Phoenix New Times article. (omitted from judicial application and Superior Court bio).

2. **Breach of Candor and Public Confidence:** The JNC application explicitly requires full disclosure of prior legal and judicial experience to assess qualifications and fitness for service. Knowingly failing to disclose prior judicial service is a breach of candor, violates **Rule 1.2** (**Promoting Confidence in the Judiciary**), and is grounds for judicial misconduct investigation.

3. **Statutory Violations:** These omissions of material facts, submitted to public offices under penalty of perjury for the purpose of securing a judicial appointment, appear to constitute **Perjury** in violation of **A.R.S. § 13-2702** and/or the **Presentment of False Instrument for Filing** in violation of **A.R.S. § 39-161**. This is a direct assault on the integrity of the selection process.

1. On or about March 24, 2025, in Maricopa County Arizona, Charlene Jackson-Etnire, did submit a written application for a civil harassment restraining order, from the Mesa City Court, executed under the penalty of perjury, in which she did willfully and knowingly state material matter to which she did not believe to be true.

2. It was material to the proceeding as described in paragraph 1.

3. On or about March 24, 2025, Charlene Jackson Etnire, while under oath as a party to a case Jackson v Gerlach, knowingly submitted a false statement with respect to a material issue as follows: "She accused me of intentionally muting the recording system in the courtroom even though I do not control the recording system in the courtroom."

4. The aforesaid statement in the application signed and submitted by Charlene Jackson Etnire, as she then and there well knew and believed, was false in that she does in fact have control over the recording system in her courtroom. Charlene Jackson's claim she does not have control over the recording system in her courtroom is provably false and universally known to be inaccurate by judicial officers across Maricopa County. Jackson's sworn denial directly contradicts her administrative role and appears designed to deflect accountability for missing or altered recordings.

   Jackson's sworn denial wasn't just false—it was a strategic attempt to suppress oversight and obstruct accountability. Her retaliatory civil harassment restraining order against Gerlach, filed after Gerlach publicly exposed these issues, further confirms a conscious effort to silence criticism and rewrite the public record. Jackson labeled Gerlach a "liar" and "conspiracy theorist" for quoting motions found on the public record and exposing Jackson's audio manipulation that amounts to Tampering with a Public Record and violations of due process.

   Multiple litigants—including Erin Gerlach—have submitted credible evidence of trimmed, muted, or missing For The Record ("FTR") audio recordings in proceedings overseen by Judge Charlene Jackson. These anomalies are disproportionately present in hearings where allegations of judicial misconduct were raised. Despite receiving repeated complaints, Judge Jackson failed to initiate any investigation, request technical assistance, or self-report these incidents to the Arizona Commission on Judicial Conduct.

1. On or about March 24, 2025, in Maricopa County Arizona, Charlene Jackson-Etnire, did submit a written application for a civil harassment restraining order, from the Mesa City Court, executed under the penalty of perjury, in which she did willfully and knowingly state material matter to which she did not believe to be true.

2. It was material to the proceeding as described in paragraph 1.

3. On or about March 24, 2025, Charlene Jackson Etnire, while under oath as a party to a case Jackson v Gerlach, knowingly submitted a false statement with respect to a material issue by claiming she never issued a ruling based on a "gut feeling" or "gut reaction" and never expressed having a "personal interest" in a case.

4. The aforesaid statement in the application signed and submitted by Charlene Jackson Etnire, as she then and there well knew and believed, was false in that she did in fact make those statements while presiding over a domestic relations case in 2024. A licensed attorney and their client attested to those very statements in a successful Motion for a Change of Judge, which can be found on the public record.

   The fact that the Motion was granted—combined with Judge Charlene Jackson's failure to report the attorney to the State Bar, as required under the Code of Judicial Conduct if she genuinely believed the attorney was dishonest—further corroborates the accuracy of the public record. Additionally, the For The Record ("FTR") courtroom audio was either trimmed or erased, indicating deliberate concealment of judicial misconduct by removing evidence from the official record.

   Screenshots from the Motion for Change of Judge confirm that Judge Jackson denied a motion based on a "gut reaction," admitted to having a "personal interest" in the case, and tampered with the FTR recording system to hide her actions. After Erin Gerlach publicly exposed this misconduct, Jackson retaliated by labeling Gerlach a "liar" and "conspiracy theorist." This defamatory framing was used to justify a civil harassment restraining order, which falsely claimed that none of the misconduct occurred and that Jackson never made the statements in question. By weaponizing the restraining order process against Erin Gerlach, Judge Jackson violated Gerlach's First Amendment rights and further demonstrated a pattern of abuse, dishonesty, concealment, and unconstitutional retaliation.

While it is true we believe Judge Jackson erred by not staying the case to await a ruling that may moot this entire action, her comments to counsel and Petitioner were punitive, petty, and ignored reality demonstrating her bias and prejudice. Specifically, Judge Jackson's bias was revealed in her attack upon both counsel and Petitioner where she stated she had a "gut reaction" that Petitioner planned this out to buy time for the juvenile court decision

to stop the family court from moving forward. Judge Jackson stated that undersigned counsel's illness seemed "fortuitous" despite the fact he provided a doctor's note and was suffering from severe symptoms (vomiting, diarrhea, fever, etc.). During the contempt trial, counsel had to requests breaks because of his symptoms and borderline fever. Additionally, Judge Jackson denied Petitioner's co-counsel the ability to speak or participate without reason, placing the full load of the trial on Petitioner's ill attorney. Such a comment impugns the integrity and impartiality of the judiciary in violation of the Code and merits review by the judiciary.

44. Jackson stated, on the record, that she had a "gut reaction" that my attorney's illness was somehow planned out for the purpose of stalling the proceedings to

until after the juvenile court ruling in order to stop the family court from moving forward.

45. She stated that my attorney's illness seemed "fortuitous." I find such comments shocking, especially from someone who supposedly has the demeanor and skill to sit in judgment of others.

46. My attorney provided Judge Jackson a verifying note from his healthcare professional and it was patently obvious he was suffering from severe symptoms (vomiting, diarrhea, fever, etc.) brought on by the virus.

55. Following conclusion of the two-day trial, on August 15, 2024 at approximately 2:52pm, while discussing the scheduling of final trial dates, Judge Jackson stated "she had a personal interest" in seeing my case through final trial and rushed the scheduling of my final trial before my case would be ripe, and did so against her divisions preferred trial scheduling protocol. Jackson's expressed statement of having a "personal interest" in any aspect of my case is deeply concerning.

(g) In effort to confirm Jackson's expressed statements of having a personal interest, I ordered the FTR audio from the proceedings. Unfortunately, the final two minutes of the FTR audio seemed to be erased or trimmed. I contacted the Maricopa County Superior Court

and was connected with Kenneth Crenshaw, Deputy Department Administrator, of the Superior Court, confirmed that despite the trial Minute Entry listing an off the record time of 2:52 pm. The FTR audio for both recording system showed an end of recording time as 2:49:44 and 2:50:58, respectively and was unable to account for the missing two minutes from the recordings, which would have likely included Jackson's statements of a personal interest. These discrepancies are highly concerning.

Again, this is not a mere few disgruntled litigants, and the Court should not dismiss the serious nature of these allegations. The consistency of these complaints, particularly the references to Judge Jackson's failure to protect children, her

arbitrary decision-making, and her apparent personal motives in handling family law cases, mirrors her actions in the case at issue. This further supports the contention that there is a broader systemic problem and one that is impugning the integrity of the Superior Court in an ongoing fashion. Petitioner intends to participate in any investigation conducted by the legislature moving forward.

1. On or about March 24, 2025, in Maricopa County Arizona, Charlene Jackson-Etnire, did submit a written application for a civil harassment restraining order, from the Mesa City Court, executed under the penalty of perjury, in which she did willfully and knowingly state material matter to which she did not believe to be true.

2. It was material to the proceeding as described in paragraph 1.

3. On or about March 24, 2025, Charlene Jackson Etnire, while under oath as a party to a case Jackson v Gerlach, knowingly submitted a false statement with respect to a material issue as follows: "She claims I have issued warrants for arrest which is untrue as I have issued 1 warrant in my career as a superior court judge."

4. The aforesaid statement in the application signed and submitted by Charlene Jackson Etnire, as she then and there well knew and believed, was false in that she issued multiple warrants in the Gerlach matter alone and on or about December 16, 2022, she issued a warrant in another case as shown:

IT IS THEREFORE ORDERED in accordance with NRS 125A.525 (in Nevada) and A.R.S. §13-4140 (in Arizona) that the Sheriff of Clark County, Nevada or any other law enforcement officer within the State of Nevada or State of Arizona shall take immediate possession of the minor children, born April 5, 2007, born January 3, 2011, and born February 24, 2013, and deliver them to In the event the minor children are not with MOTHER, then MOTHER shall be immediately arrested, and shall only be released upon confirmation of the minor children being in physical care and control.

It is further ordered to bring said children before the Honorable Charlene D. Jackson, Judge of the Superior Court of Maricopa County, Family Division at 222 East Javelina Avenue, Mesa, Arizona and then and there on the 30th day of January, 2023 at 3:30 o'clock P M. of that day.

DONE IN OPEN COURT this date: 12/16/2022

Honorable Judge/Commissioner
MARICOPA COUNTY SUPERIOR COURT
Judge Charlene D. Jackson

Coordinated Retaliation: Collusion Between Judge Charlene Jackson and the Arizona Commission on Judicial Conduct

Allegations of Institutional Collusion: Judge Jackson and the Arizona Commission on Judicial Conduct

Judge Charlene Jackson and the **Arizona Commission on Judicial Conduct (the "Commission")** are accused of engaging in a severe and unconstitutional abuse of authority by colluding to surveil a litigant, **Erin Gerlach**, who filed complaints and threatened to go to the media about her case.

The central evidence for this claim comes from Judge Jackson's own sworn statements in her restraining order she filed against Erin Gerlach on **March 24, 2025**. In her sworn filing, Judge Jackson stated that on **November 17, 2023,** she received an email from the Arizona Commission on Judicial Conduct informing her that Erin Gerlach had filed judicial complaints, and that within those complaints, Gerlach allegedly "threatened to go to the media" about her case.

Charlene Jackson's Sworn Statement:

> ***"I also received an email from the Judicial Conduct Commission advising me that the defendant filed judicial complaints against me and within the complaints the defendant threatened to go to the media about her case. Based on the threat and contents of her complaint they notified court security of the threats. Later that day, I spoke with court security about the nature of the defendants case, and was advised they were monitoring her conduct and online presence for cyberstalking."***

The Core Allegations of Systemic Misconduct

The actions of the Commission constitute a profound failure of its core duties and dereliction of its Constitutional mandate, made worse by its composition:

1. **A Deliberate Violation of Law:** The Commission is the state's ethical watchdog, with its members being primarily judges and attorneys who are experts in the law. They unequivocally know what a citizen's constitutional rights are, including their First Amendment rights to Free Speech and to Petition the Government. Yet, they allegedly treated this protected speech as a security threat, demonstrating a deliberate disregard for the Constitution while simultaneously ignoring the serious ethical violations presented against Judge Jackson.

2. **A Grave Breach of Public Trust:** The Commission is responsible for maintaining the integrity of the judiciary and protecting the public from judicial abuse by investigating

complaints and enforcing the Code of Judicial Conduct. As the oversight agency, the Commission is expected to know, unequivocally, that surveilling a complainant for legally protected acts—such as filing a judicial complaint (the right to petition) or stating an intent to speak to the media (free speech)—is unconstitutional and illegal. Their action is not a mistake but a deliberate disregard for the law by the very body tasked with enforcing ethical conduct.

3. **Unlawful Retaliation and Surveillance:** The Commission's response to Gerlach's complaint was not an investigation of the judge; it was an act of collusion. By coordinating surveillance with Judge Jackson, the Commission turned its investigative function into a weapon. The Commission is expected to know that a citizen's right to free speech (engaging with the media) and the right to petition the government (filing judicial complaints) are constitutionally protected. Treating these protected acts as a security threat and placing a complainant under surveillance is a direct, high-level violation of civil liberties. The coordinated monitoring of Gerlach's online speech by the judge, court security, and the Commission is characterized as institutional stalking, harassment, official misconduct and a misuse of public resources.

   Adding insult to injury, the Commission knowingly allowed a judge to continue ruling on matters involving the person she was secretly monitoring—a critical ethical lapse and a direct failure to require Judge Jackson's recusal. All the rulings issued by Judge Jackson while she harbored a concealed bias and conflict are tainted, caused real harm and constitute additional violations of the Code of Judicial Conduct.

4. **Violation of Constitutional Rights:** The U.S. Constitution grants every citizen the right to Free Speech and the right to Petition the Government for a redress of grievances. The act of criticizing a public official, a court, or the conduct of a judge is considered core political speech and is afforded the highest level of protection. Gerlach's actions are protected by the First Amendment. The Commission and court security unlawfully reframed these protected acts as harassment or a security threat, turning the oversight process into a tool of intimidation to chill free speech.

   Gerlach is not a public figure like Judge Charlene Jackson is. Therefore, she is not subjected to the same unreasonable privacy breaches as a Judge is and her rights to privacy were violated by this unlawful and retaliatory surveillance.

   The entire case was corrupted when Judge Jackson engaged in, and concealed, misconduct—such as participating in secret investigations—while continuing to issue rulings. This extreme breach is argued to rise to the level of a Fraud on the Court. These actions of Judge Jackson fundamentally denied Gerlach the right to a fair hearing guaranteed by the Due Process Clause of the Fourteenth Amendment. Arizona's Rule 2.11 is clear: A judge must step aside the moment her impartiality might reasonably be questioned. Because Judge Jackson developed and acted upon a personal bias (Rule

2.11(A)(1)) and possessed secret knowledge of disputed facts, she was obligated to recuse herself. Her failure to do so, continuing to rule in a case where she was secretly gathering evidence and collaborating with adversaries, is the definition of misconduct. To make matters worse, Gerlach filed multiple Motions for Change of Judge or Motions requesting Recusal, each was denied.

5. **Direct Institutional Collusion:** The Commission is responsible for investigating judges and maintaining the integrity of the judiciary. However, by participating in the surveillance and failing to require Judge Jackson to recuse herself from Gerlach's case, the Commission appears to have knowingly allowed Judge Jackson to continue ruling on matters involving the person she was secretly monitoring. This inaction demonstrates a profound collapse of the Commissions' neutrality and demonstrates a concerning conflict of interest.

   Judge Jackson's admission under oath—that multiple public agencies were actively monitoring Gerlach's constitutionally protected speech—underscores an urgent and dangerous threat to civil liberties that signals the Commission failed in its duty, became complicit in the suppression of accountability and participated in Judicial Retaliation while knowingly emboldening Judge Charlene Jackson to continue violating the Code of Judicial Conduct with impunity.

6. **Conflict of Interest:** When Gerlach uncovered and reported a conflict of interest (that the Judge was presiding over her niece's case) using publicly available records, the Commission's response was to say they could not verify the familial relation and questioned how Gerlach knew of this information. Gerlach provided the Commission with publicly available information including records of Judge Jackson and her niece living at the same addresses, public social media posts they were both tagged in, public records, etc. The Commission allegedly framed Gerlach's due diligence as "cyberstalking" instead of publicly available evidence of a conflict that if the Commission had actually investigated Gerlach's credible complaint themselves as they should have, they would have found the same evidence.

7. **The Suspicious Timeline** Undermines the Threat Claim: The most damning aspect of Judge Jackson's conduct lies in the fundamental conflict surrounding her alleged status as a victim, which creates a critical ethical dilemma from which she cannot escape. If Judge Jackson genuinely believed Gerlach posed a personal threat, judicial ethics mandated her immediate recusal from the case, as a victim cannot serve as a neutral judge to their alleged adversary, creating an undeniable conflict and a constitutional due process violation. Judge Jackson remained on the case for over a year after this allegation, continuing to issue adverse rulings including warrants and financial sanctions while summarily denying all motions filed by Gerlach. Jackson didn't file the restraining order against Gerlach until 4 months after recusal and 4 months after the last alleged act of "harassment." In fact, all the acts of "harassment" alleged in Jackson's restraining order took place while she presided over the case. The significant delay and continued judicial

participation strongly suggest that her claims of being "harassed," “cyberstalked,” and “threatened,” and the resulting use of court security and a restraining order, were not acts of genuine self-protection, but a calculated, retaliatory, abuse of process and judicial power aimed at intimidating a litigant she and the Commission wanted to silence.

This forces an inescapable conclusion: Either Judge Jackson was dishonest in her restraining order by retroactively reframing Gerlach’s lawful advocacy as "harassment" or "cyberstalking" to justify a calculated act of retaliation, or she intentionally and knowingly failed to recuse from the case back in November 2023 when this alleged incident occurred. In either scenario, her behavior constitutes a clear and serious violation of the Code of Judicial Conduct that caused actual harm to a litigant, her child and the legal system while creating an embarrassing scandal reflecting poorly on Arizona’s Judiciary.

Unanswered Questions on the Scope of the Abuse

The final and most alarming implication of the allegations is that the misconduct points to a wider, systemic abuse of power, making the situation deeply unsettling. The sworn admission that multiple public agencies, including the Commission, court security, and law enforcement, were actively monitoring Gerlach’s speech after she threatened to go to the media about her case, suggests the system's power was weaponized to intimidate a citizen for exercising her constitutional rights.

This raises critical, unanswered questions that demand investigation:

1. How many other complainants have been unlawfully placed under surveillance, harassed, intimidated, and retaliated against for challenging judicial conduct?

2. How many other judges has the Commission colluded with to cover up judicial misconduct?